

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC  
REPAIR SYSTEMS PRODUCTS  
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02327  
MDL 2327**

-----  
**ETHICON WAVE 9 CASES LISTED IN  
EXHIBIT A TO PLAINTIFFS' NOTICE  
OF ADOPTION**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
OF STANLEY ZASLAU, M.D. FOR WAVE 9**

---

Plaintiffs filed a Notice of Adoption [Dkt. 8300] in the Wave 9 cases identified in Exhibit A to their Notice adopting their Motion to Exclude the Opinions and Testimony of Stanley Zaslau and Supporting Memorandum from Ethicon Wave 1, Wave 3, and Wave 4. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Dr. Zaslau in Ethicon Wave 1 [Dkt. 2162], Wave 3 [Dkt. 2898], and Wave 4 [Dkt. 3780]. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Waves 1, 3, and 4 response briefing.

Dated: June 12, 2019

Respectfully submitted,

/s/ Susan M. Robinson

Susan M. Robinson (W.Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
srobinson@tcspllc.com

/s/ William M. Gage

William M. Gage (MS Bar #8691)

Butler Snow LLP

1020 Highland Colony Parkway

Suite 1400 (39157)

P.O. Box 6010

Ridgeland, MS 39158-6010

(601) 985-4561

William.Gage@butlersnow.com

COUNSEL FOR DEFENDANTS

ETHICON, INC. AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ Susan M. Robinson

Susan M. Robinson (W.Va. Bar #5169)

Thomas Combs & Spann PLLC

300 Summers Street

Suite 1380 (25301)

P.O. Box 3824

Charleston, WV 25338

(304) 414-1807

srobinson@tcspllc.com